

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
<b>LASAUNDRA WILLIAMS</b>	:	<b>BK. No. 18-17415-jkf</b>
<b>Debtor</b>	:	
	:	<b>Chapter No. 13</b>
<b>HSBC BANK USA, N.A., AS INDENTURE</b>	:	
<b>TRUSTEE FOR THE REGISTERED</b>	:	
<b>NOTEHOLDERS OF RENAISSANCE HOME</b>	:	
<b>EQUITY LOAN TRUST 2007-2</b>	:	
<b>Movant</b>	:	<b>11 U.S.C. §362</b>
<b>v.</b>	:	
<b>LASAUNDRA WILLIAMS</b>	:	
<b>Respondent</b>	:	

**MOTION OF HSBC BANK USA, N.A., AS INDENTURE TRUSTEE FOR THE  
REGISTERED NOTEHOLDERS OF RENAISSANCE HOME EQUITY LOAN TRUST 2007-  
2 FOR RELIEF FROM AUTOMATIC STAY UNDER §362 PURSUANT TO BANKRUPTCY  
PROCEDURE RULE 4001**

Movant, by its attorneys, PHELAN HALLINAN DIAMOND & JONES, LLP, hereby requests a termination of Automatic Stay and leave to foreclose on its mortgage on real property owned by WILLIE B. WILLIAMS (DECEASED) AND LOUISE E. WILLIAMS (DECEASED).

1. Movant is **HSBC BANK USA, N.A., AS INDENTURE TRUSTEE FOR THE REGISTERED NOTEHOLDERS OF RENAISSANCE HOME EQUITY LOAN TRUST 2007-2**.

2. Debtor, LASAUNDRA WILLIAMS is a potential heir to the estate of WILLIE B. WILLIAMS (DECEASED) AND LOUISE E. WILLIAMS (DECEASED) and has a potential interest in the premises located at **819 WINDER DRIVE, BRISTOL, PA 19007**, hereinafter known as the mortgaged premises.

3. Movant is the holder of a mortgage on the mortgaged premises.

4. Debtor's failure to tender monthly payments in a manner consistent with the terms of the Mortgage and Note result in a lack of adequate protection.

5. Movant wishes to proceed with foreclosure proceedings on the mortgage because of Debtor's failure to make the monthly payment required hereunder.

6. The foreclosure proceedings were stayed by the filing of the instant Chapter 13 Petition.

7. As of February 6, 2019, Debtor has failed to tender post-petition mortgage payments for the months of December 2018 through February 2019. The monthly payment amount for the months of December 2018 through February 2019 is \$1,052.37 each, for a total amount due of \$3,157.11. The next payment is due on or before March 1, 2019 in the amount of \$1,052.37.

8. Movant, **HSBC BANK USA, N.A., AS INDENTURE TRUSTEE FOR THE REGISTERED NOTEHOLDERS OF RENAISSANCE HOME EQUITY LOAN TRUST 2007-2**, requests the Court award reimbursement in the amount of \$1,031.00 for the legal fees and costs associated with this Motion.

9. Movant has cause to have the Automatic Stay terminated as to permit Movant to complete foreclosure on its mortgage.

10. Movant specifically requests permission from the Honorable Court to communicate with Debtor and Debtor's counsel to the extent necessary to comply with applicable nonbankruptcy law.

11. OCWEN LOAN SERVICING, LLC services the underlying mortgage loan and note for the property referenced in this Motion for Relief for HSBC BANK USA, N.A., AS INDENTURE TRUSTEE FOR THE REGISTERED NOTEHOLDERS OF RENAISSANCE HOME EQUITY LOAN TRUST 2007-2 (the noteholder) and is entitled to proceed accordingly. Should the Automatic Stay be lifted and/ or set aside by Order of this Court or if this case is dismissed or if the debtor obtains a discharge and a foreclosure action is commenced or recommenced, said foreclosure action will be conducted in the name of HSBC BANK USA, N.A., AS INDENTURE TRUSTEE FOR THE REGISTERED NOTEHOLDERS OF RENAISSANCE HOME EQUITY LOAN TRUST 2007-2 (the noteholder). HSBC BANK USA, N.A., AS INDENTURE TRUSTEE FOR THE REGISTERED NOTEHOLDERS OF RENAISSANCE HOME EQUITY LOAN TRUST 2007-2 (the

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noteholder) has the right to foreclose because Noteholder is the original mortgagee or beneficiary or assignee of the security instrument for the referenced loan. Noteholder directly or through an agent has possession of the promissory note and the promissory note is either made payable to Noteholder or has been duly endorsed.

**WHEREFORE**, Movant respectfully requests that this Court enter an Order;

a. modifying the Automatic Stay under Section 362 with respect to **819 WINDER DRIVE, BRISTOL, PA 19007** (as more fully set forth in the legal description attached to the Mortgage of record granted against the Premises), as to allow Movant, its successors and assignees, to proceed with its rights under the terms of said Mortgage; and

b. Movant specifically requests permission from this Honorable Court to communicate with Debtor and Debtor's counsel to the extent necessary to comply with applicable nonbankruptcy law; and

c. Granting any other relief that this Court deems equitable and just.

/s/ Robert J. Davidow, Esquire  
Robert J. Davidow, Esq., Id. No.321821  
Phelan Hallinan Diamond & Jones, LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
Phone Number: 215-563-7000 Ext  
Fax Number: 215-568-7616  
Email: Robert.Davidow@phelanhallinan.com

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